

1 [PROPOSED] ORDER

2 GOOD CAUSE SHOWN, IT IS HEREBY ORDERED that Defendant Jimmy
3 Alejandro Jarquin's request for modification of bond is granted.

4 IT IS FURTHER ORDERED that Mr. Jarquin shall be allowed to
5 travel to Carson, California to compete in a Jiu Jitsu Tournament
6 from September 6, 2013 through September 8, 2013; and travel to
7 Long Beach, California to compete in a Jiu Jitsu Tournament from
8 from October 4, 2013 through October 6, 2013.

9 IT IS FURTHER ORDERED that Mr. Jarquin shall provide
10 Pretrial Services with a detailed itinerary of his travel
11 arrangements as well as a contact address and telephone number
12 while traveling.

13 IT IS FURTHER ORDERED that all other terms and conditions of
14 pretrial supervision remain in effect.

15 IT IS SO ORDERED.

16
17 DATED: 8/30/13

18 THE HONORABLE JOSEPH C. SPERO
19 United States District Magistrate Judge

1 BRIAN A. NEWMAN for
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8 Attorneys for Defendant Jimmy Alejandro Jarquin

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 UNITED STATES OF AMERICA,) CR No. 3:12-CR-00406-MMC (JCS)-1
15 Plaintiff,)
16 v.) [PROPOSED] ORDER MODIFYING
17 JIMMY ALEJANDRO JARQUIN,) CONDITIONS OF RELEASE
18 Defendant.)
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1 numerous occasions without incident.

2 8. Mr. Jarquin agrees to provide Pretrial Services with a
3 detailed itinerary and to obey all of their rules and
4 regulations.

5 I declare under penalty of perjury that the aforementioned
6 is true and correct and if called as a witness I could testify
7 competently thereto.

8 Dated this 28th day of August, 2013 at Redondo Beach,
9 California.

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11 /S/
12 BRIAN A. NEWMAN

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1 **DECLARATION OF BRIAN A. NEWMAN**

2 I, BRIAN A. NEWMAN declare:

3 1. I am licensed to practice law before this court,
4 the United States District Court for the Northern District of
5 California, and all courts in the State of California.

6 2. I am an attorney of record for Defendant
7 Jimmy Alejandro Jarquin in an action in the United States
8 District Court for the Northern District of California.

9 3. Mr. Jarquin has contacted counsel with regard to
10 traveling to Carson, California to compete in a Jiu Jitsu
11 Tournament from September 6, 2013 through September 8, 2013; and
12 regarding traveling to Long Beach, California to compete in a
13 Jiu Jitsu Tournament from from October 4, 2013 through October 6,
14 2013.

15 4. Mr. Jarquin would travel via automobile with colleagues
16 and stay at a local hotel for the September travel and via
17 commercial airline and stay at a local hotel for the October
18 travel.

19 5. On August 28, 2013 Assistant United States Attorney
20 Kevin Barry was notified with regard to this request. Mr. Barry
21 informed this Declarant that he has no objection and authorized
22 this Declarant to sign his name to this Stipulation.

23 6. On August 28, 2013 United States Pretrial Services
24 Officer Josh Libby was left a detailed voicemail message with
25 regard to this request. As of this date he has not informed this
26 Declarant as to his position to this request.

27 7. Mr Jarquin has been granted permission to travel on

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2 Mr. Jarquin would travel via automobile with colleagues and
3 stay at a local hotel for the September travel and via commercial
4 airline and stay at a local hotel for the October travel.

5 All other terms and conditions would remain in effect.

On August 28, 2013, Assistant United States Attorney Kevin Barry informed the undersigned that he has no objection to this request and authorized the undersigned to sign his name to this Stipulation.

10 On August 28, 2013 United States Pretrial Services Officer
11 Josh Libby was contacted with regard to this request. As of this
12 date, Mr. Libby has not informed the undersigned assistant as to
13 his position regarding the request. It should be noted that Mr.
14 Jarquin has been allowed to travel without incident on numerous
15 occasions.

16 | SO STIPULATED:

17 | DATED: August 28, 2013

/s/

BRIAN A. NEWMAN
Attorney for JIMMY ALEJANDRO JARQUIN

20 MELINDA HAAG
United States Attorney

22 | DATED: August 28, 2013

Kevin J. Barry
KEVIN J. BARRY
Assistant United States Attorney
[VIA EMAIL AUTHORIZATION]

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8 Attorneys for Defendant Jimmy Alejandro Jarquin

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 UNITED STATES OF AMERICA,) CR No. 3:12-CR-00406-MMC (JCS)-1
15 Plaintiff,)
16 v.) STIPULATION AND [PROPOSED] ORDER
17 JIMMY ALEJANDRO JARQUIN,) MODIFYING CONDITIONS OF RELEASE
18 Defendant.)
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21 IT IS HEREBY STIPULATED BY AND BETWEEN Brian A. Newman,
22 attorney for Defendant Jimmy Alejandro Jarquin and Assistant
23 United States Attorney Kevin Barry that Mr. Jarquin's conditions
24 of bond be modified, specifically that he be allowed to travel to
25 Carson, California to compete in a Jiu Jitsu Tournament from
26 September 6, 2013 through September 8, 2013; and travel to Long
27 Beach, California to compete in a Jiu Jitsu Tournament from from
28 October 4, 2013 through October 6, 2013.

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